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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HEATHER HILLBOM, individually and
on behalf of all others similarly situated,

Case No.: 2:24-cv-00664-JAD-EJY

Plaintiff,

VS.

R1 RCM INC.; and DIGNITY HEALTH
d/b/a DIGNITY HEALTH - ST. ROSE
DOMINICAN HOSPITAL, ROSE DE
LIMA CAMPUS.

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
RESPONSE AND REPLY TO
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S CLASS
ACTION COMPLAINT [ECF 18]**

(FIRST REQUEST)



1 Plaintiff HEATHER HILLBOM (“Plaintiff”) and Defendants R1 RCM INC.;
2 and DIGNITY HEALTH d/b/a DIGNITY HEALTH - ST. ROSE DOMINICAN
3 HOSPITAL, ROSE DE LIMA CAMPUS (together as “Defendants”) (collectively as
4 “the Parties”), by and through their counsel, hereby stipulate to extend the Parties’
5 respective deadlines to respond and reply to Defendants’ Motion to Dismiss
6 Plaintiff’s Class Action Complaint (the “Motion”) (ECF 18).

7 WHEREAS, Defendants filed their Motion on August 27, 2024. (ECF 18).

8 WHEREAS, Plaintiff’s Response or Opposition to the Motion is presently due
9 on September 10, 2024.

10 WHEREAS, Defendants’ Reply in support of their Motion is presently due on
11 September 17, 2024.

12 WHEREAS, the Parties have conferred and mutually agreed to an extension of
13 time for the Parties’ briefing schedule related to Defendants’ Motion as follows:

14 • Plaintiff’s Response to the Motion to be filed by October 10, 2024; and
15 • Defendants’ Reply in support of the Motion to be filed by October 31, 2024.

16 WHEREAS, the Court issued a Notice setting an in-person hearing for
17 Defendants’ Motion on a stacked calendar on Monday, November 4, 2024 at 02:30
18 PM in Las Vegas Courtroom 6D before Judge Jennifer A. Dorsey. (ECF 19).

19 WHEREAS, in light of the Parties’ agreed upon extension of time of the
20 Parties’ briefing schedule related to Defendants’ Motion, the Parties propose that the
21 hearing on Defendants’ Motion be continued to November 25, 2024 or a later date
22 which is convenient for the Court.

23 WHEREAS, this is the Parties’ first stipulation to extend these deadlines and is
24 not made for the purposes of delay.

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1 IT IS THEREFORE STIPULATED between the Parties as follows:

2 1. Plaintiff's Response to the Motion due by October 10, 2024;

3 2. Defendants' Reply in support of the Motion due by October 31, 2024; and

4 3. Hearing on Defendants' Motion continued to November 25, 2024 or a later

5 date which is convenient for the Court.

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7 DATED this 6th day of September 2024.

8 Respectfully submitted,

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10 By: /s/ Mona Amini

11 Mona Amini, Esq.

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13 Attorneys for Plaintiff

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15 By: /s/ Philip R. Erwin

16 Philip R. Erwin, Esq.

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19 Sean G. Wieber, Esq. (*pro hac vice*)
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21 Attorneys for Defendants

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24 ORDER

25 IT IS SO ORDERED.

26 Dated: 9/11/24

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HON. JENNIEFER A. DORSEY
UNITED STATES DISTRICT JUDGE

